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Counsel for Plaintiff Tanya Gersh

UNITED STATES DISTRICT COURT DISTRICT OF MONTANA MISSOULA DIVISION

TANYA GERSH,

Plaintiff,

v.

ANDREW ANGLIN,

Case No. 9:17-cv-00050-DLC-KLD

NOTICE OF FILING OF AFFIDAVIT OF SARA E. HERSHMAN REGARDING ATTORNEYS' FEES

Defendant.

Plaintiff Tanya Gersh by and through her counsel of record, Paul,
Weiss, Rifkind, Wharton & Garrison LLP, files this Notice of Filing of Affidavit
of Sara E. Hershman Regarding Attorneys' Fees. In accordance with this Court's
Order of February 9, 2021 (ECF 232), the undersigned counsel submits an
affidavit, attached hereto, detailing known fees and costs associated with Plaintiff's
Motion to Compel Defendant to Respond to Plaintiff's Post-Judgment Discovery
Requests (ECF 228).

Dated this 19th day of February, 2021

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

BY:

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Counsel for Plaintiff Tanya Gersh

UNITED STATES DISTRICT COURT DISTRICT OF MONTANA MISSOULA DIVISION

TANYA GERSH,

Plaintiff,

Case No. 9:17-cv-00050-DLC-KLD

ANDREW ANGLIN,

v.

AFFIDAVIT OF SARA E.
HERSHMAN REGARDING
ATTORNEYS' FEES

Defendant.

- I, Sara E. Hershman, hereby swear and affirm the information contained herein is true and accurate to the best of my knowledge.
- 1. This affidavit is being submitted in accordance with the Court's Order of February 9, 2021 granting subject to certain modifications Plaintiff's Motion to Compel Defendant Andrew Anglin to Respond to Plaintiff's Post-Judgment Discovery Requests ("Order"). (See ECF 232 at 1). The Court ordered that counsel for Plaintiff and Judgment Creditor Tanya Gersh "file an affidavit of counsel that sets forth the reasonable expenses, including attorney fees, that were incurred in the presentation of [Plaintiff's] motion to compel." (Id. at 15).
- 2. Paul, Weiss, Rifkind, Wharton & Garrison LLP ("Paul, Weiss") has been retained by Plaintiff in connection with the above captioned case.
 - 3. I am an associate at Paul, Weiss. My hourly rate is \$980.
- 4. In preparation for submission of this affidavit, I have reviewed the billing entries for time spent in relation to preparing and filing Plaintiff's Motion to Compel Defendant to Respond to Plaintiff's Post-Judgment Discovery Requests (ECF 228) and Brief in Support (ECF 229) ("Motion to Compel").
- 5. Attached hereto as Exhibit A is a true and correct copy of time entries which were exported from Paul, Weiss's billing system in spreadsheet form.

- 6. The spreadsheet includes only those time entries related to preparing Plaintiff's Motion to Compel. All unrelated time entries have been redacted. The spreadsheet does not include time spent during counsels' attempts to meet and confer with the Defendant.
- 7. The spreadsheet shows the date the time was billed, the timekeeper's name, the billed amount for the time spent, the number of billable hours, and a descriptive time narrative.
- 8. This affidavit excludes time billed by Daniel J. Kramer and other associates and partners at Paul, Weiss, and time billed by Beth Littrell of the Southern Poverty Law Center and John Morrison of Morrison, Sherwood, Wilson & Deola PLLP, for preparing the Motion to Compel.
 - 9. As shown in the attached spreadsheet, I billed 8.4 hours.
- 10. Accordingly, the attorneys' fees involved in bringing the Motion to Compel totaled \$8,232.00.

DATED this 19th day of February, 2021

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